



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 10, 2010

Ms. Mary Beth Adams
NEPA Coordinator
Timber and Watershed Laboratory
P. O. Box 404
Parsons, WV 26287

Re: Final Environmental Impact Statement, Fernow Experimental Forest, Tucker County, WV,
October 2010 CEQ # 20100402

Dear Ms. Adams:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Fernow Experimental Forest, Parsons, WV and your response to our comments on the Draft Environmental Impact Statement (DEIS). EPA assigned a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project to the DEIS. EPA appreciates the additional information incorporated into the Final EIS to address comments on the Draft; based on the information to date, EPA has the following remaining concerns.

While we understand the purpose and need of the proposed project, we have concerns about potential impacts to the environment and monitoring of environmental conditions. While the studies described in the EIS provide valuable information and we understand the need to have these studies continue in the same manner for consistency of data, the monitoring as explained in this document may not detect all impacts caused by the Forest Service's activities. Stream monitoring should include chemical, physical, and biological monitoring and should not just be conducted in larger streams and water bodies. Subtle changes may be detected earlier and impacts can be avoided or minimized, if monitoring is conducted in small headwater streams. Observations made in upstream reaches may assist in identifying problems which would eventually affect downstream water quality, channel structure or biological integrity. Additional monitoring may also provide valuable information that can be used for the ongoing studies. Cumulative impacts should also be evaluated.



Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Ms. Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,



Barbara Rudnick
NEPA Team Leader

